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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

RICKY DAVIS,

Plaintiff,

vs.

COUNTY OF EL DORADO, et al.,

Defendants.

) Case No.: 2:22-cv-00262-DC-JDP

)

) **STIPULATION, REQUEST AND**

) **~~PROPOSED~~ ORDER TO EXTEND**

) **EXPERT DISCOVERY DEADLINES**

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On January 17, 2025, the Court granted a stipulated modification to the scheduling order such that “expert disclosures shall be completed by 4/10/2025; rebuttal disclosures shall be completed by 6/12/2025; expert discovery shall be completed by 7/14/2025; and all motions, except for motions for continuances, temporary restraining orders or other emergency applications shall be filed no later than 9/4/2025.” ECF No. 68.

Since then, the parties completed fact discovery and then participated in a settlement conference on February 25, 2025 and March 5, 2025. The parties delayed expert expense during the negotiation period with the hope that it would be unnecessary, however the case did not resolve.

Accordingly, the parties hereby stipulate to and request that the court extend the expert discovery deadlines by approximately 45 days. The parties are not requesting an extension of the September 4, 2025 motion filing deadline.

1 The parties request that the Court modify the schedule such that expert deadlines fall on
2 the following new dates:

- 3 • Expert disclosures shall be completed by June 1, 2025;
- 4 • Rebuttal disclosures shall be completed by August 1, 2025;
- 5 • Expert discovery shall be completed by September 1, 2025.

6 **SO STIPULATED.**

7
8 Dated: March 17, 2025

MCLANE, BEDNARSKI & LITT, LLP

/s/ Laura Donaldson

By: _____

DAVID MCLANE

LAURA DONALDSON

Attorneys for Plaintiff RICKY DAVIS

14
15 Dated: March 17, 2025

ANGELO, KILDAY & KILDUFF, LLP

/s/ Derick E. Konz

By: _____

DERICK E. KONZ

Attorneys for Defendants COUNTY OF EL
DORADO and TERESA PIPER as personal
representative for the Estate of Larry Hennick

21
22 Dated: March 17, 2025

RANKIN, SHUEY, MINTZ, LAMPASONA
& REYNOLDS

/s/ David Shuey

By: _____

DAVID T. SHUEY

Attorneys for Defendant DR. ROBERT
ANTHONY

1 Dated: March 17, 2025

EVANS, WIECKOWSKI, WARD &
SCOFFIELD, LLP

3 /s/ Carol Wieckowski

4 By: _____

CAROL WIECKOWSKI

Attorneys for STRASSER and
FITZGERALD

PROPOSED ORDER

Upon stipulation of all parties and good cause appearing, the Court modifies the expert discovery deadlines as follows:

- Expert disclosures shall be completed by June 1, 2025;
- Rebuttal disclosures shall be completed by August 1, 2025;
- Expert discovery shall be completed by September 1, 2025.

All other deadlines remain unchanged.

IT IS SO ORDERED.

Dated: March 17, 2025


JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE